

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JORDAN ANCEL,)	
)	
Plaintiff,)	United States District Court
)	Case No. 1:23-cv-15834
vs.)	
)	Circuit Court of Cook County, Illinois
JENNIFER KARUM and MONICA RUIZ,)	Case No. 2023 L 004921
)	
Defendants.)	

AGREED MOTION TO REMAND AND DISMISS

Defendant, MONICA RUIZ (“Ruiz”), by and through her attorney, and by agreement of all parties, moves this Honorable Court to remand forthwith the captioned action to the Law Division of the Circuit Court of Cook County, Illinois, and thereafter dismiss the captioned action. In support of her Agreed Motion to Remand and Dismiss, Ruiz states as follows:

1. On November 9, 2023, on behalf of Ruiz, the undersigned filed a Notice of Removal of the referenced pending state court lawsuit in which Ruiz was a defendant, invoking the Court’s diversity jurisdiction.

2. Although the Notice of Removal was filed in good faith, the undersigned has determined that removal was improper, and this action should be remanded to the Law Division of the Circuit Court of Cook County. Plaintiff did not file an appearance in this action following the removal of this case.

3. Upon remand, the captioned action should be dismissed.

WHEREFORE, Defendant Ruiz, respectfully requests that the Court issue an order remanding the matter to the Circuit Court of Cook County, Illinois, and dismiss thereafter dismiss this action.

Dated: November 22, 2023

Respectfully submitted,

MONICA RUIZ

By: /s/ George J. Spathis
One of her attorneys

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CERTIFICATE OF SERVICE

I, George J. Spathis, an attorney, hereby certify that on November 22, 2023, I caused a true and correct copy of the foregoing document to be filed with the Clerk of the Court using the CM/ECF filing system and served upon the parties listed below via electronic mail.

Attorneys for Plaintiff:

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/s/ George J. Spathis